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August 11, 2025

VIA ECF

Hon. Valerie Figueredo  
Daniel Patrick Moynihan U.S. Courthouse  
Southern District New York  
500 Pearl St.  
New York, NY 10007

**Re: Goolden v. Wardak, Case No. 1:19-CV-06257 (ALC) (VF)**

Dear Judge Figueredo,

As you are aware I have a pending motion to withdraw representation from Plaintiff Sarah Goolden in the above-captioned case. I write in regard to Your Honor's July 22, 2025 Scheduling Order (Dkt. 256) wherein you scheduled a telephone conference for August 14, 2025 to again address my motion to withdraw. In the Order you specified that the conference will be ex parte "because the dispute could require the disclosure of information protected by the attorney-client privilege."

**I respectfully request that you assign a neutral to conduct this conference.**

While I decline to continue representing Ms. Goolden, for all the reasons discussed in my motion and oral argument and have every right under the letter of engagement and the rules of Professional Responsibility to withdraw, I also feel protective of the integrity of Ms. Goolden's valid claims against defendant Wardak. I do not feel that it would be appropriate to discuss the details about an attorney-client relationship before the same judge adjudicating that client's case insofar as it could be prejudicial to the client's case.

As such, I respectfully request that this Honorable Court assign a neutral to conduct this ex-parte conference.

If identifying a neutral will cause the conference date to be rescheduled, please be aware that I am unavailable from August 27 through September 23, 2025.

Sincerely,

/s/ Carrie Goldberg  
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*cc. Sarah Goolden*

  
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